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WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D. C. 20006
(202) 429-7000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

R. MICHAEL SENKOWSKI
(202) 429-7249

April 23, 1993

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(202) 429-7049
TELEX 248349 WYRN UR

Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

92-9

Re: Ex-Parte Presentation
Amendment of the Commission's Rules to Establish
New Personal Communications Services, GEN Docket
No. 90-314; ET Docket No. 92-100; Redevelopment of
Spectrum to Encourage Innovation in the Use of New
Telecommunications Technologies, ET Docket No. 92-
9. ✓

Dear Ms. Searcy:

In accordance with Section 1.1206(a)(2) of the Commission's Rules, 47 C.F.R. § 1.1206(a)(2) (1991), this is to notify the Commission that on April 22, 1993, R. Michael Senkowski and Robert J. Butler of Wiley, Rein and Fielding, representatives of the Unlicensed PCS Ad Hoc Committee for 2 GHz Microwave Transition and Management, met with Acting General Counsel Renee Licht and staff.

The purpose of these meetings was to discuss issues related to the deployment of unlicensed Personal Communications Services. Attached is a summary of the presentation to these Commission officials.

Should you have any questions regarding this matter, please call me at (202) 429-7249.

Respectfully submitted,

R. Michael Senkowski

R. Michael Senkowski

RMS/lar
Encl.

cc: Renee Licht
Participating Staff Members

UNLICENSED PERSONAL COMMUNICATIONS SERVICE STEPS TO MAKING DEPLOYMENT A REALITY

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Unlicensed PCS Can Bring Enormous Benefits to the Public and the Country. The FCC has proposed allocating spectrum for important new unlicensed PCS offerings. This FCC contribution to improving the nation's telecommunications infrastructure is significant in several major respects:

- **Unlicensed PCS consists of wireless data, voice and messaging systems and devices operating at low power with high portability. Portable units may talk directly to other portable units or through a site located system. Unlike licensed PCS, which is focused on wide area service, Unlicensed PCS fills the void for "on site" or campus wide service. With the need for licensing removed, prospective buyers will be able to purchase equipment with ease, convenience and confidence.**
- **There is an huge consumer demand for Unlicensed PCS representing a market of millions of devices worth billions of dollars.**
- **Unlicensed PCS will provide tremendous opportunities for U.S. manufacturers to improve the nation's telecommunications infrastructure and continue its leadership in global telecommunications markets.**
- **The U.S. economy can be strengthened and new jobs created with implementation of Unlicensed PCS.**

The Unlicensed PCS Ad Hoc Committee for 2 GHz Microwave Transition and Management ("UTAM") Is Addressing the Challenges of Ensuring that Existing Microwave Users Are Protected from Interference and Relocated Consistent with Commission Requirements.¹ Companies representing a broad cross section of American industries related to computing, telecommunications and business equipment have formed UTAM to recommend regulatory actions to promote timely deployment of unlicensed PCS offerings. This requires solutions to some major problems:

- **The Unlicensed PCS industry will have to find funding for many millions of dollars in costs associated with relocating microwave stations in the proposed Unlicensed PCS spectrum.**
- **During the relocation process, the Unlicensed PCS industry must ensure that deployment of Unlicensed PCS will not cause interference to existing microwave licensees.**

¹ WINForum, a separate industry organization, is addressing the different but equally important issue of developing spectrum etiquette(s) to allow for orderly sharing of unlicensed devices within the band

- **The Unlicensed PCS industry must assume responsibility for managing the relocation process, satisfying microwave licensee concerns, and resolving any disputes.**
- **A system of ensuring equitable Unlicensed PCS industry participation in the funding and management of these challenges is necessary.**

An Open Industry Entity Will Be Necessary for Implementation of Unlicensed PCS. As a result of extensive meetings among prospective suppliers of unlicensed systems and devices, UTAM has reached consensus that participation of all suppliers of unlicensed PCS equipment in an open industry entity is needed to assume relocation and spectrum management functions. The Unlicensed PCS entity should be formed consistent with the following principles:

**Participants in the Unlicensed PCS Ad Hoc Committee for
2 GHz Microwave Transition and Management:¹**

Companies

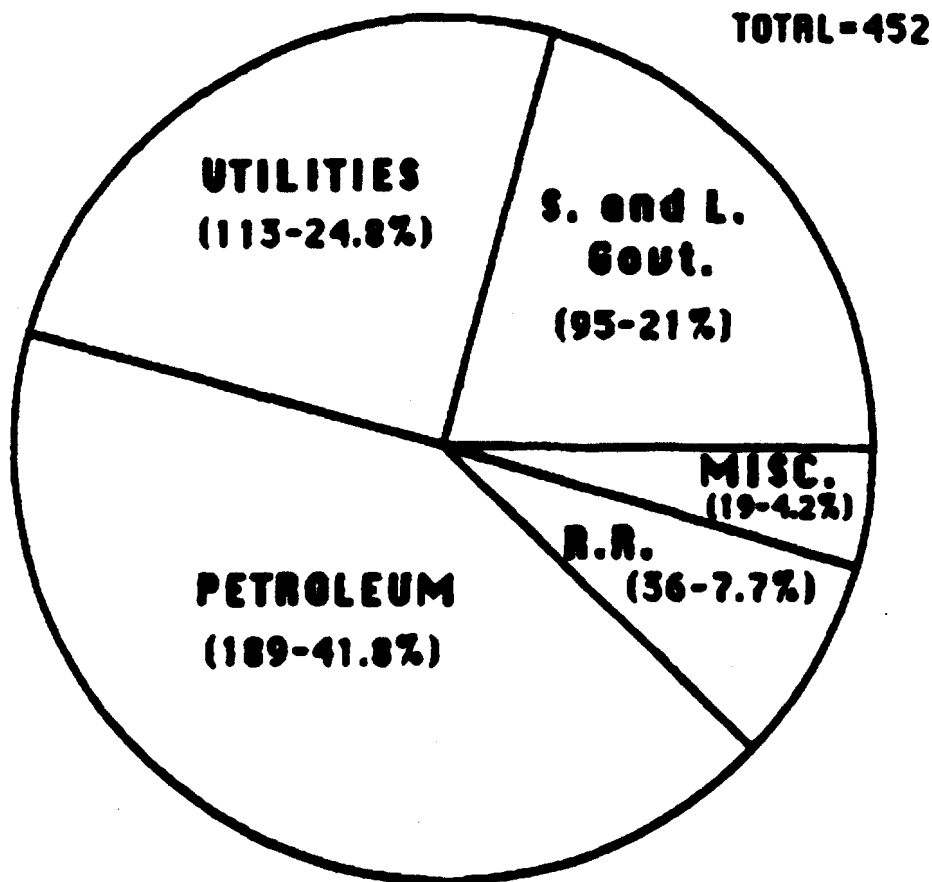
AT&T
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Rolm
Rose Communications
Siemens Stromberg-Carlson
Sprint
Telesciences
Time Warner Tel
US West

Organizations

Bellcore
NATA
PCCA
Telocator
USTA
WINForum

¹ The attached proposal represents the consensus views of the Committee and should not be ascribed to any individual member.

**MICROWAVE LINKS
BY TYPE
(1910-1930MHZ)
(U.S.)**



MOTOROLA 11/92